

III. REMARKS

Claims 1-26 remain pending. Claims 1-3, 9, 18-20, and 26 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lurie (US 2009/0063246 A), hereafter “Lurie”, and further in view of Chaddha et al. (US 2006/0293942 A1), hereafter “Chaddha”. Claims 4-7, 10-15, 21, 22-24 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lurie, and further in view of Chaddha, and further in view of Mikurak (US 7,130,807), hereafter “Mikurak”. Claims 8, 17, and 25 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lurie, and further in view of Chaddha, and further in view of Mikurak, and further in view of Sultan (US 2009/0089125 A1), hereafter “Sultan”.

Applicants have herein amended claims 1, 10 and 18. No new matter is believed added.

Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

With regard to independent claim 1 (and similarly claims 10 and 18), Applicants submit that Lurie and Chaddha fail to teach each and every feature presented in the claim.

In the claimed system, both a customer and a support provider can access a Customer Relationship Management (CRM) System to view case information for a customer's case. The claimed invention also includes a compliance tracking system that retrieves previously loaded customer compliance data from a database; wherein the compliance data consists of information related to whether a customer has met certain pre-set goals set by the CRM system, to determine whether a compliance issue exists. In other words, the claimed invention determines whether a customer has met certain goals set by the system, *i.e.*, whether a student has taken the requisite

courses, or whether a patient has filled the necessary medical prescriptions. If a compliance issue exists, the claimed system escalates the case to a different tier. The Office does not assert that any of the cited art teaches or discloses all the claimed features of the claimed invention, but instead, cites to several references, each allegedly teaching one aspect of the claimed invention. Applicants submit that none of the cited references, either singly or in combination, teach all the claimed elements of the claimed invention that work together in the same way as set forth in the claims.

For example, the first cited reference, Lurie, discloses a system for service providers to manage service seekers. Lurie does not disclose a CRM that is accessible to both service providers and service seekers, nor does Lurie disclose a compliance tracking system that determines whether a service seeker has a compliance issue. The second cited reference, Chaddha, discloses a CRM system that includes a “compliance module” that monitors usage and leases/licenses to determine whether users are compliant, i.e., an IT provider can determine the status of a user’s software licenses. Chaddha does not disclose a CRM system that is accessible to both service providers and service seekers, nor does Chaddha disclose a compliance tracking system, as in the claimed system, that interacts with the CRM system to escalate cases to different tiers based on a compliance indicator. The third reference, Mikurak, is cited for the basic concept of different tiers of service providers in a customer service environment. Again, Mikurak, does not disclose a CRM system or a compliance tracking system that interacts with the CRM system in the same way as the claimed invention. The fourth reference, Sultan, is cited for the claimed element of a red, yellow, green compliance indicator, in dependent claims 8, 17 and 25. Again, Sultan does not disclose a compliance tracking system that interacts with a CRM system as in the claimed invention.

For these reasons, none of the cited references, either singly or in combination, teach or disclose a CRM system that is accessible to both service providers and service seekers, that escalates cases to different tiers appropriately, with a compliance tracking system that determines whether a compliance issue exists, and takes action if such a compliance issue exists.

Accordingly, for all the reasons discussed above, Applicants submit that Lurie and Chaddha fail to teach each and every feature presented in claims 1, 10 and 18 and therefore requests that the rejections to those claims, and the claims that depend therefrom, be withdrawn.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserves the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

Applicants respectfully submit that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

/Meghan Q. Toner/
Meghan Q. Toner
Reg. No. 52,142

Dated: June 18, 2010

Hoffman Warnick LLC
75 State Street
Albany, NY 12207
(518) 449-0044 - Telephone
(518) 449-0047 - Facsimile